

EXHIBIT 16
REDACTED VERSION
OF DOCUMENT SOUGHT
TO BE SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

)
CISCO SYSTEMS, INC.,)
)
Plaintiff,)
) Case No.
vs.) 5:14-CV-05344-BLF (PSG)
)
ARISTA NETWORKS, INC.,)
)
Defendants.)
)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY
VIDEOTAPED DEPOSITION OF SONI JIANDANI
Palo Alto, California
Friday, April 29, 2016
Volume I

Reported by:
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CSR No. 8239
Job No. 2301259

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1 of whether -- do I want to take -- whether I have a
2 goal or not to take something out. The goal clearly
3 here was that, as I inherit the product, please help
4 me fix the quality and feature velocity so we can go
5 win out there.

6 Q Who decides whether Cisco will set as a
7 goal to take Arista out of an account? Who makes
8 that decision?

9 MS. CANDIDO: Objection.

10 THE WITNESS: Who makes that decision?

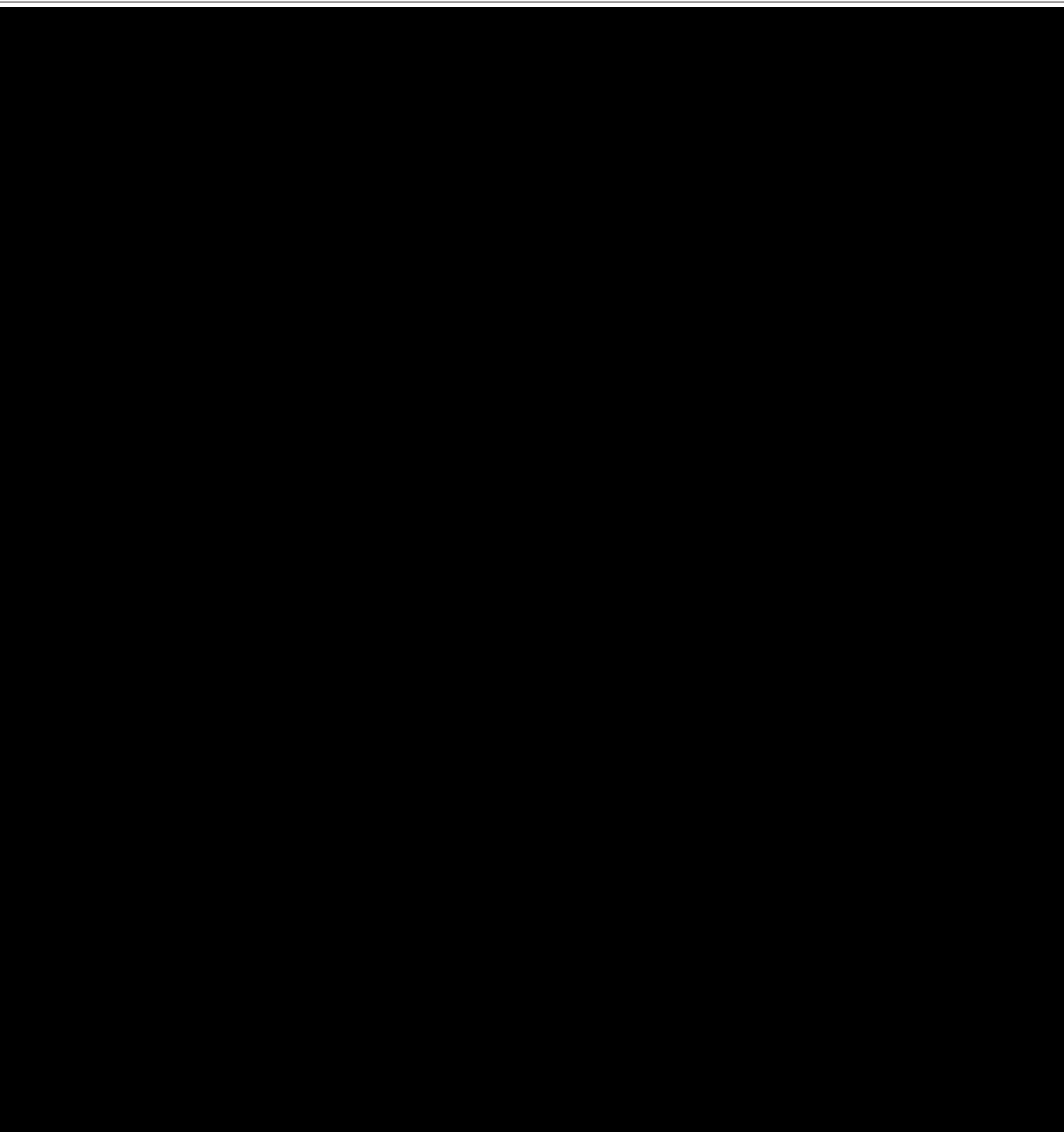
11 BY MR. FERRALL:

12 Q Yeah.

13 A Whether it's -- it would be -- it could be
14 anyone. It could be an account manager who has that
15 goal. It could be a sales leader in a particular
16 vertical that may have that goal. It's -- the
17 responsibility is so distributed in this company in
18 terms of sales responsibility lies in the hands of
19 the sales leadership team. Product leadership and
20 product velocity and leadership lies in the hands of
21 product business units.

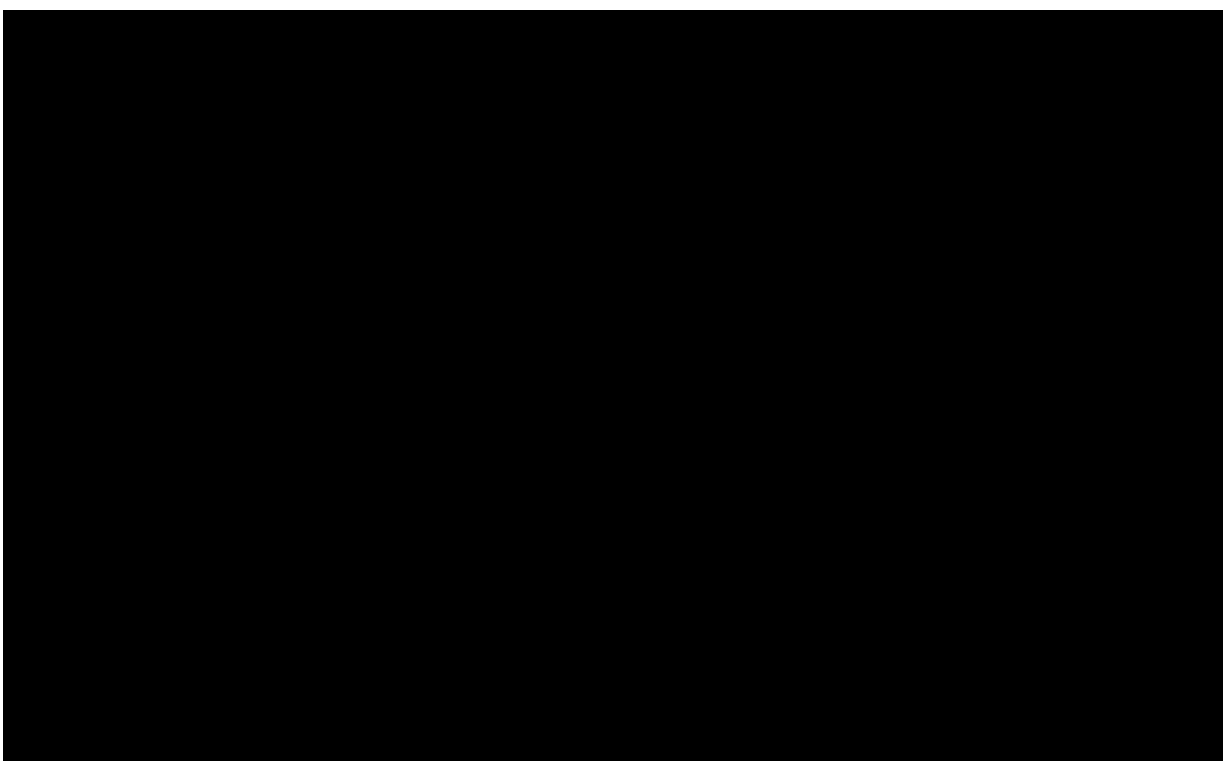
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A We would have monthly meetings in which we would talk about the state of the business, the state of the market share positions and the state of the innovations that we were driving and delivering and a competitive update would be part of that in those monthly meetings.

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Q Well --

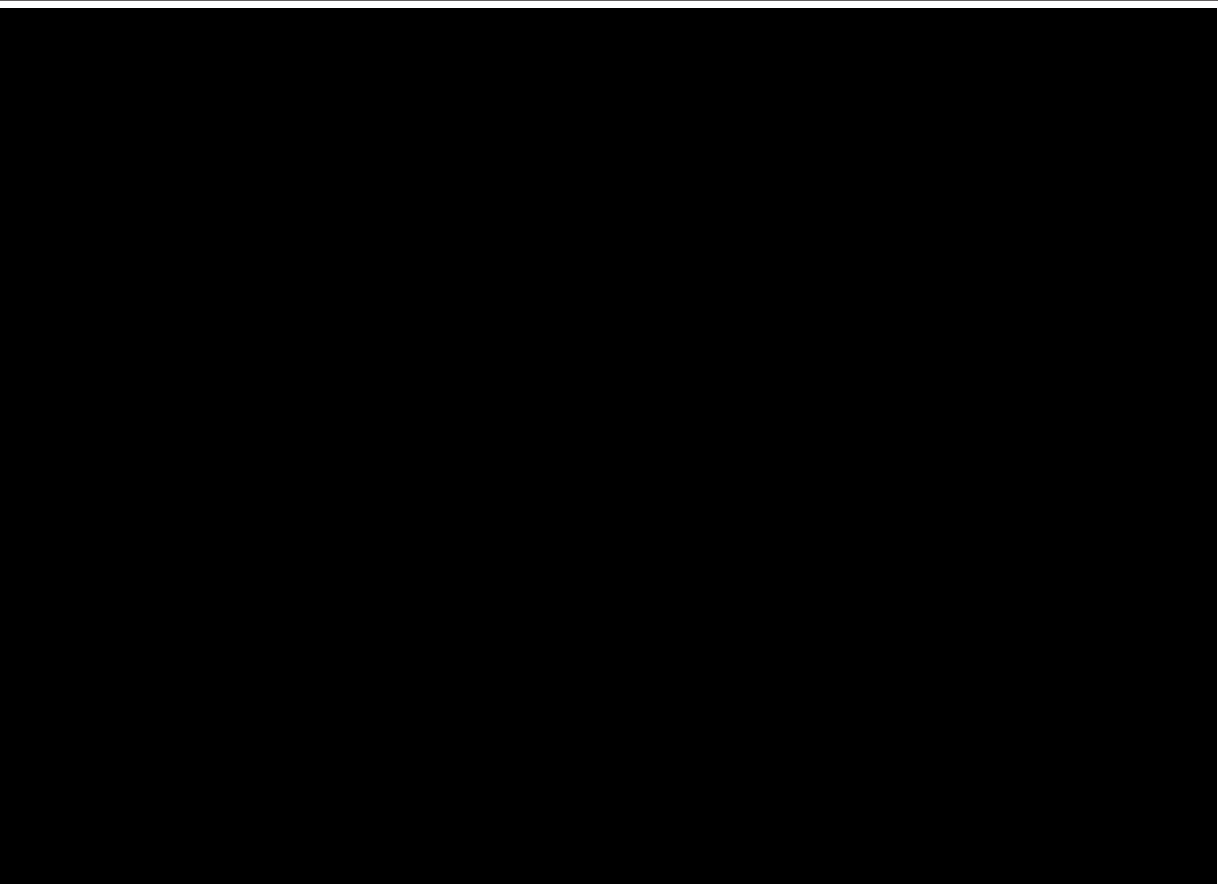
A So that was a very general discussion. It wasn't just targeted to strategies -- how to compete with one vendor or strategies on how to compete with another vendor.

For example, one of the things that we always tracked with John was new custom acquisitions, repeat customers and we'll be acquiring new customers across a broader base of the market. And we would discuss strategies on how we can bring to bear prior technologies that we have brought to market to get a more balanced view of customer acquisitions. So these were very generic discussions that we were having and not pertaining

1 to any one particular competitive situation or one
2 competitor per se.



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MR. FERRALL: Okay. Let me mark this as
the next exhibit.

(Exhibit 615 was marked for
identification by the court reporter.)

THE WITNESS: Thank you.

BY MR. FERRALL:

Q Exhibit 615 is an email exchange between
you and Mr. Faustini dated February 21, 2014,
control number CSICLI03283619.

A Okay.

Q And my question for you is do you recall a
-- competing with Arista for a sale to ADP?

1 A I do not recall.

2 Q Mr. Faustini writes to you that "Scott
3 Gibbs --" quote: "Scott Gibbs and I have been
4 working to put together a proposal for the Arista
5 takeout."

6 Do you know what that means?

7 A I don't recollect this discussion with
8 Anthony Faustini.

9 Q Do you understand what the term "Arista
10 takeout" means?

11 A Not in the context of ADP and what the
12 proposal is for an Arista takeout.

13 MR. FERRALL: Okay. All right. Put that
14 aside.

15 I'm going to mark two exhibits together
16 here because I have the color printout of one.

17 (Exhibits 616 and 617 were marked for
18 identification by the court reporter.)

19 THE WITNESS: Thank you.

20 BY MR. FERRALL:

21 Q So Exhibit 615 is an email dated March 31,
22 2014, from Ish Limkakeng to you.

23 MS. CANDIDO: Ryan, I think you're off one
24 exhibit number.

25 MR. FERRALL: Oh, you're right. Sorry.

1 Q What guidance did Mr. Chambers give to you
2 in this -- in response?

3 A I do not have recollections of what was
4 the interaction, but I have been able to -- by
5 reading this presentation, it has brought back the
6 timelines of the shipment of the Nexus 9300, and it
7 has also brought back to me as to what the purpose
8 of these slides was. It was really to give him a
9 comprehensive update on our plans on the engineering
10 side, what we were planning to do with the channels
11 and just an update on also the overall Arista IPO
12 details.

13 Q Who was -- was there a meeting in which
14 these slides were presented?

15 A There would be a monthly -- this would be
16 part of a monthly review with him.

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24 A Yes.

25 Q Okay. And when did you learn of this

1 mandate from John to sales leadership?

2 A So this was not learning of a -- mandating
3 a no-lose thing. As I mentioned, we have a no-lose
4 approach for, say, Juniper in this provider space.
5 We would have a no-lose approach in the commercial
6 space for Hewlett Packard as a competitor.

7 So this was, again -- it reads almost like
8 it's an ask, which is -- the ask would be John to
9 the sales leadership, a no-lose approach with a 9K
10 in ACI to the salespeople because that terminology,
11 no lose, would be used in the sales organization,
12 but, again -- this is, again, a subset of the
13 slides. This is not the entire presentation.
14 There's a bigger portion of the deck in which we
15 presented to him our engineering innovations, what
16 we are building for the company --

17 Q Okay. That wasn't my question.

18 A Yes. But this is, again, a subset of a
19 one-hour discussion you would have.

20 Q Okay. All right. So the mandate,
21 whatever -- however you want to describe it, comes
22 from Mr. Chambers, according to this at least. Is
23 that correct?

24 MS. CANDIDO: Objection.

25 THE WITNESS: This has been written by Ish

1 Limkakeng, who prepared the presentation, and he is
2 the one who has added this bullet because he is the
3 one who prepared the slide deck. And he got,
4 particularly from me, the guidance on Microsoft as
5 an update because he wasn't well versed on what was
6 going on and because he wasn't that involved, and he
7 also got an update from me on the channel plan.

8 BY MR. FERRALL:

9 Q But I assume that Ish didn't get the word
10 from Mr. Chambers to say, "Put in there that there's
11 a mandate from me to sales leadership," right?

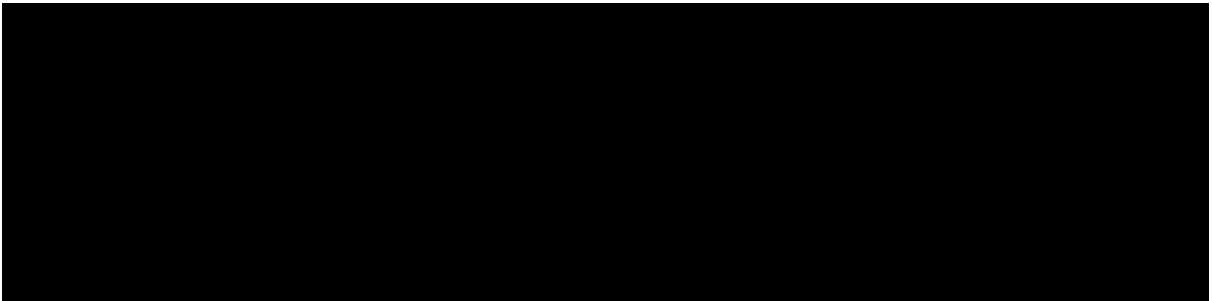
12 A So --

13 MS. CANDIDO: Objection.

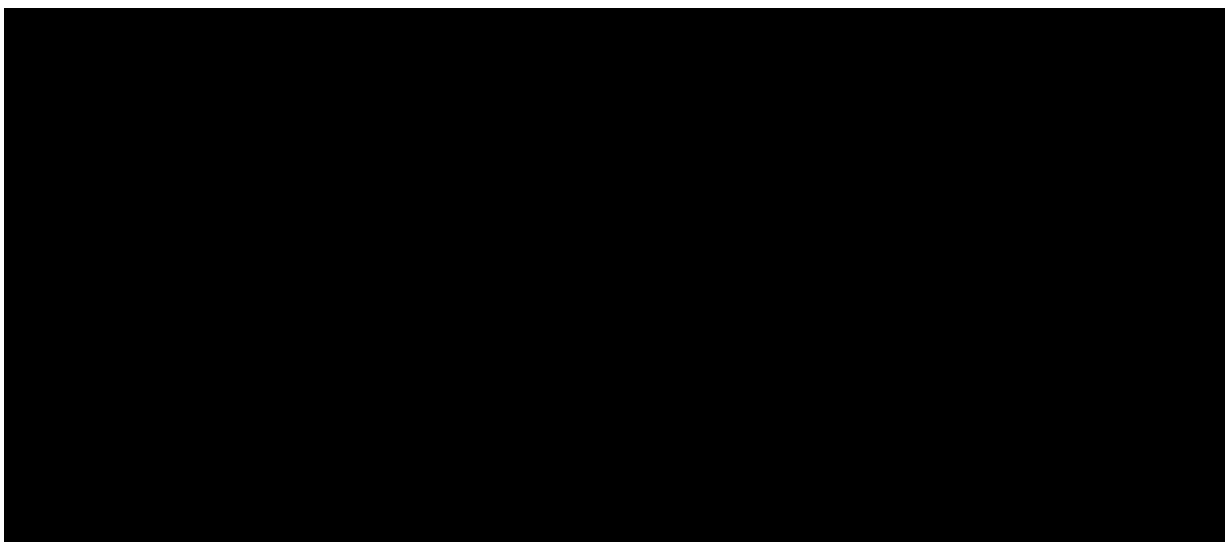
14 THE WITNESS: This is -- this is not what
15 John is saying to us in the meeting. This is what
16 the business unit is putting in front of John as a
17 set of slides to review with him. So we have not --
18 please do not read out of this that these are all
19 John Chambers' comments.

20 So, for example, go to the first page --

21 BY MR. FERRALL:



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Q Okay.

A -- to the sales force.

Q And so what was Mr. Chambers' reaction to that?

A I would not remember what -- every element of what was reviewed here and his reaction would be. No differently than the first -- last bullet of the first page, 6 -- of Exhibit 617 where we say: "NOSTG OS initiatives better align with mega scale data center needs, countering Arista EOS and Cumulus."

So some of these were more -- we are informing you as updates. Some of these were more of a request items. So I do not have a recollection of -- in this subsegment of a meeting that happened a year plus two months ago, what the outcome of the discussions were.

1 Q Okay. Do you recall whether John Chambers
2 ever conveyed to some portion of the company that
3 there was a no-lose approach with regard to Arista?

4 A I would not have a recollection of this.

5 Q Let's take a break from this -- I don't
6 mean that kind of break. Sorry. Just change --
7 change subjects for a second. Sorry about that. I
8 wanted to make sure I got the background on -- on
9 Insieme.

10 Whose idea was it to form Insieme?

11 A I would not know whose idea it was to form
12 Insieme.

13 Q Who would I need to talk to to find an
14 answer to that question?

15 A You could -- you could contact Mario
16 Mazzola or Luca Cafiero.

17 Q Was there a requirement of Cisco board
18 approval for Insieme?

19 MS. CANDIDO: Objection.

20 THE WITNESS: I do not know.

21 BY MR. FERRALL:

22 Q Do you know if -- do you know what
23 Mr. Chambers' input was on the formation of Insieme?

24 A I would not know because I wasn't in those
25 discussions.